Brian A. Bender, Esq. (BAB-0218) Harris Beach PLLC 100 Wall Street New York, New York 10005 (212) 687-0100

Attorneys for Defendant LEFRAK ORGANIZATION, INC.

21 MC 102 (AKH)

IN RE: WORLD TRADE CENTER LOWER MANHATTAN DISASTER SITE LITIGATION

UNITED STATED DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

ISMA GALLEGO and HERNANDO GALLEGO,

Case No.: 07-CV-1497 (AKH)

Plaintiffs,

-against-

BATTERY PARK CITY AUTHORITY, EMPIRE STATE PROPERTIES, INC., HUDSON TOWERS HOUSING CO., INC., LEFRAK ORGANIZATION, INC., LIBERTY HOUSE CONDOMINIUM, LIBERTY TERRACE CONDOMINIUM, and MILFORD MANAGEMENT CORP.,

NOTICE OF ADOPTION OF ANSWER TO MASTER COMPLAINT OF LEFRAK ORGANIZATION, INC.

Defendants.

PLEASE TAKE NOTICE THAT defendant, LEFRAK ORGANIZATION, INC., as and for its response to the allegations set forth in the Complaint by Adoption (Check-Off Complaint) Related to the Master Complaint filed in the above-referenced action, hereby adopts its Verified Master Answer dated July 30, 2007, which was filed in the matter of *In Re: World Trade Center Lower Manhattan Disaster Site Litigation*, 21 MC 102 (AKH). LEFRAK ORGANIZATION, INC. has filed a Master Disclosure of Interested Parties in 21 MC 102

(AKH), and as such, is exempt from having to file such a disclosure in this specific matter, pursuant to the provisions of Case Management Order No. 4 (¶ J(2)).

WHEREFORE, LEFRAK ORGANIZATION, INC. demands judgment dismissing the above-captioned action as against it, together with its costs and disbursements.

Dated: New York, New York September 10, 2007

Yours etc.,

HARRIS BEACH PLLC

Brian A. Bender, Esq. (BAB-0218)

HARRIS BEACH PLLC Attorney for Defendant

LEFRAK ORGANIZATION, INC.

100 Wall Street, 23rd Floor New York, New York 10005 (212) 687-0100

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IN RE: WORLD TRADE CENTER LOWER MANHATTAN DISASTER SITE LITIGATION	21 MC 102 (AKH)
UNITED STATED DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK	
ISMA GALLEGO and HERNANDO GALLEGO,	Case No.: 07-CV-1497 (AKH)
Plaintiffs,	07-C V-1497 (ARTI)
-against-	
BATTERY PARK CITY AUTHORITY, ET AL.,	
Defendants.	

NOTICE OF ADOPTION OF ANSWER TO MASTER COMPLAINT OF LEFRAK ORGANIZATION, INC.

HARRIS BEACH, PLLC

Attorneys for Defendant LEFRAK ORGANIZATION, INC. 100 Wall Street, 23rd Floor

New York, New York 10005 (212) 687-0100